

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001**

**Civil Action No.  
03 MDL 1570 (GBD) (FM)**

*This document applies to  
Hoglan, et al. v. The Islamic Republic  
of Iran, et al.  
1:11-cv-07550-GBD*

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**MOTION TO WITHDRAW AS COUNSEL FOR ANGELA LEGRAND**

We, the undersigned counsel, on behalf of all counsel representing the Plaintiffs in the above-captioned matter, respectfully move this Court for an Order granting leave to withdraw as counsel for Angela LeGrand. In support of this Motion, counsel avers the following:

1. Plaintiff Angela LeGrand retained the undersigned counsel on August 31, 2011.
2. At the time the retainer agreement was signed, counsel was under the impression that Angela LeGrand was a cousin of 9/11 Decedent George Smith.
3. As the litigation progressed, the relationship between Angela LeGrand and 9/11 decedent George Smith became unclear to counsel. Before the First Amended Complaint was filed on September 13, 2011, Angela LeGrand claimed to be a cousin of decedent George Smith. Before the filing of the Second Amended Complaint on October 28, 2013, Angela LeGrand claimed to be the sister of decedent George Smith.
4. Because of the discrepancy in relationship, counsel requested Angela LeGrand to provide documentation supporting the true nature of the relationship between her and decedent George Smith.

5. Counsel repeatedly, in telephone conversations, *via* first class mail and in a Fed Ex package signed for on November 4, 2014, asked Angela LeGrand to provide counsel with documentation to establish the relationship between Angela LeGrand and decedent George Smith.
6. Counsel also requested information to support a claim during the damages inquest.
7. Despite repeated requests, counsel has not received documentation or any reply from Angela LeGrand.
8. Counsel believes the attorney client relationship is irreparably broken such that counsel cannot pursue this action on behalf of Angela LeGrand.

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court enter an Order in the form attached hereto as Exhibit A granting their Motion to Withdraw and providing Angela LeGrand thirty (30) days to retain new counsel or report to the Court that she will pursue this matter *pro se*.

Respectfully submitted,

/s/ Stephen A. Corr

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*On Behalf of All Counsel of Record*

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I, Stephen A. Corr, Esquire, hereby certify that the foregoing Motion to Withdraw as Counsel for Angela LeGrand was filed through the court's ECF service and a copy served upon all counsel and parties who have appeared through the ECF. In addition, a copy of the Motion is being served *via* first class mail to the following:

Angela LeGrand  
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/s/ Stephen A. Corr  
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